

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. )  
PELVIC REPAIR SYSTEMS )  
PRODUCTS LIABILITY LITIGATION )  
                                  )  
                                  )  
                                  ) **MDL NO. 2327**  
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**UNOPPOSED MOTION TO APPOINT SPECIAL MASTER**

Napoli Shkolnik, PLLC, (“Plaintiffs’ Counsel”), as counsel for certain plaintiffs in *In Re: Ethicon, Inc. Pelvic Repair Systems Products Liability Litigation*, MDL 2327 (S.D. W.Va.), and Ethicon Inc., Johnson & Johnson, and Ethicon LLC (“Ethicon”), have entered into a Confidential Master Settlement Agreement (the “Settlement Agreement”) to resolve the claims related to the implantation of Ethicon Pelvic Repair Products, as defined in the Settlement Agreement. Plaintiffs’ Counsel, with no opposition of Defendant Ethicon, and pursuant to the terms of the Settlement Agreement hereby moves this Court to appoint Randi S. Ellis as the Special Master in aid of execution of the settlement.

Accordingly, Plaintiffs’ Counsel requests the Court enter an order appointing Randi S. Ellis to assist in the administration and implementation of their settlement with Ethicon, and authorize her to:

- Determine the calculation, allocation, division and distribution of settlement payments among the claimants pursuant to the terms of the Settlement Agreement to provide for fair and reasonable compensation for each claimant based on the facts and circumstances of this litigation; and
- Serve as a mediator to resolve disputes of claims as set forth in the Settlement Agreement.

In further support thereof, Plaintiffs' Counsel submits an Affidavit from Randi S. Ellis, detailing her qualifications to so serve, attached here as Exhibit A.

## CONCLUSION

For the foregoing reasons, Plaintiffs' Counsel respectfully requests that the Court appoint Randi S. Ellis as the Special Master to aid in the execution of the settlement pursuant to the Master Settlement Agreement and enter an order in the form submitted herewith.

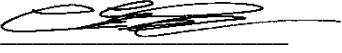
Dated: February 12, 2020

Respectfully Submitted,

  
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/s/  
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Counsel for the Plaintiffs

**CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/:   
Christopher LoPalo (New York Bar #  
4184859)  
Napoli Shkolnik PLLC